

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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INDIANAPOLIS

OFFICE MEMORANDUM

DATE: July 25, 1986

TO: RCRA File

THRU: Richard Strong *ffh*FROM: Bruce Kizer *ck*
Compliance Monitoring SectionSUBJECT: Enforcement Follow-up Inspection
Design and Manufacturing-Absocold Corporation
1767 Sheridan Street
Richmond
IND 087032207

EPA Region 5 Records Ctr.



348910

On June 6, 1986, I conducted an inspection of the above-mentioned facility to determine their compliance in regard to a March 17, 1986, Notice of Violation (V-287). Design and Manufacturing-Absocold Corporation's response indicated this facility had been closed and sold.

This inspection revealed Sanyo Corporation had taken control of the property. Mr. Randy Kincaid, Maintenance Supervisor, provided me with a tour of the facility. Sanyo Corporation is continuing some of the same operations previously operated by Design and Manufacturing-Absocold Corporation. The generation of methylene chloride from cleaning foam injection guns and toluene from a painting process were still in operation.

Several 55-gallon drums (six) were observed along the east dock of the Absocold building. Two of these drums had labels identifying the contents as spent methylene chloride generated by Design and Manufacturing-Absocold Corporation. Mr. Kincaid stated Sanyo Corporation would properly dispose of these drums.

Although a complete inspection was not conducted, it was apparent from my conversation with Mr. Kincaid that Sanyo Corporation lacked several components needed for compliance with 320 IAC 4.1 (contingency plan, personnel training, marking and dating of hazardous waste containers).

Based on the information gathered, Design and Manufacturing-Absocold Corporation no longer has control of this facility. All wastes generated had been removed except for the above-mentioned drums of methylene chloride. It appears that Sanyo E & E Corporation has assumed ownership and responsibility for this property. The Sanyo E & E Corporation (Mr. Kincaid) was notified by telephone of the change of ownership requirements (notification form mailed to the company) and that a complete RCRA inspection of the facility may be conducted to evaluate their compliance with the hazardous waste regulations (320 IAC 4.1 and 40 CFR 260-265).

DBK/cl

ENFORCEMENT INSPECTION REQUEST

Facility Name: Albright - Mfg. - Alcoa Cold Key
 I.D. Number: 102087032207
 Cause/Case No.: V-287
 Request Date: 5-22-86
 Inspection Needed By: 6-22-86
 Enforcement Staff: D.M.T.
 CM Staff: D.B.R.
 Technical Staff: _____

(Completed by
Enforcement)

Evaluation Type: EFI

Inspection (Next Evaluation) Date: 86/6/6

(Completed by

Evaluation Comment: _____

Inspector)

During the compliance inspection, the terms of the Order (attached) were reviewed for compliance. The following statements reflect the degree of compliance at the time of the inspection:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

See Trip Report

Additional remarks
on Reverse?

Yes No

Bruce Kizer
Inspector's Name

6/6/86
Date of Report

Attachment

STATE BOARD OF HEALTH

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: March 5, 1986

TO: RCRA File

THRU: Richard Strong *14g*FROM: D. Bruce Kizer *DBK*
Compliance Monitoring SectionSUBJECT: Inspection of D and M Corporation-Absocold Corp
1767 Sheridan Street
Richmond, Indiana
IND 087032207

On January 23, 1986, I conducted an inspection of the above-mentioned facility. Mr. Paul Fuller, Lab Supervisor, represented the facility.

The pre-inspection file audit revealed very little information. Their federal notification was not on file. The 1983 annual report indicated they were a large quantity generator of toluene and methylene chloride. A contingency plan had been reviewed at D and M's request. The facility had not previously been inspected.

Mr. Paul Fuller provided me with a tour of the facility. D and M Corporation and Absocold Corporation have the same owner and are located on the same property. Absocold Corporation manufactures small refrigerators. Waste generated is from the cleaning of equipment used to inject foam insulation between the walls of the refrigerator. After each unit is injected with foam, the gun is cleaned by spraying methylene chloride into a 55-gallon drum. Absocold also generates a nonhazardous hydraulic oil from injection molding machines. D and M Corporation manufactures small dishwashers. Processes utilized include metal washing and coating, steam cleaning, painting, and vinyl coating. The metal washing and coating (iron and zinc phosphate) generate rinses which are discharged to the city sewer (the phosphate solutions are not discarded) and a sludge from the bottom of the phosphate tank. The painting generates spent toluene from the cleanup of equipment. Spent toluene is collected in 5-gallon buckets at the paint booths and transferred to 55-gallon drums for accumulation. The vinyl coating generates a nonhazardous sludge from the application of primer coat prior to vinyl coating.

✓ D and M Corporation is closing operations at the Richmond plant. Several operations have been removed or are no longer operating. These operations include a porcelain operation, a spray applied etching and Ni plating system, a methylene chloride stripping operation, and a wastewater treatment system. A small quantity of Ni filter sludge remained on-site at the filtering system. This sludge was reported to have been previously disposed of at the Richmond Sanitary Landfill.

Violations cited during the inspection include, waste determination, manifest deficiencies, personnel training, and incomplete emergency equipment lists.

Based on the information gathered during this inspection, D and M Corporation-Absocold Corporation is a generator of hazardous waste. I recommend a Notice of Violation be issued to address the deficiencies cited during the inspection.

DBK/cl
cc: Enforcement Section
Mr. Norman J. Gray

Paul Feller

317/ 962-4571

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 6/4/85
updated 12/22/86
BY: B. Kizer

COMPANY: Design & Mfg. Corp. - Absocold Corp.

LOCATION: 1767 Sheridan St. Richmond

I.D.#: IN/D/087/032/207

TYPE: G---T---TSD---UI (CIRCLE)

A. GENERAL

	<u>YES</u>	<u>NO</u>	<u>NA</u>
1. FEDERAL NOTIFICATION ON FILE?	---	<input checked="" type="checkbox"/>	---
2. FEDERAL PART A ON FILE?	---	---	<input checked="" type="checkbox"/>
3. CLOSURE PLAN REVIEWED?	---	---	<input checked="" type="checkbox"/>
4. CONTINGENCY PLAN REVIEWED?	<input checked="" type="checkbox"/>	---	---
6. ANNUAL REPORT REVIEWED?	<input checked="" type="checkbox"/>	---	---

← reviewed at their request

B. NOTIFICATION DATA

1. Waste codes listed:

NA
Notification not on file

C. WASTE APPROVAL INFORMATION:

1. List waste amounts and landfill approved

none on file

D. FEDERAL PART A; STATE PART A (Handling Codes)

(Resolve Differences During Inspection/Visit)

<u>FEDERAL</u>			<u>STATE</u>		
CODE	AMT	UNIT	CODE	AMT	UNIT
1	<i>N/A</i>				
2					
3					
4					
5					

E. CLOSURE/POST-CLOSURE(check against fed/state part A) *N/A*

1. closure cost: _____ post-closure cost: _____

2 ANY CLOSED UNITS Y/N; If yes, describe:

3 FINANCIAL ASSURANCE FILED Y/N; If yes date filed __/__/__
Date next filing due __/__/__

F. COMPLIANCE HISTORY

not previously inspected
1 Date of last two(2) inspections: __/__/__/ __/__/__

2 List all past enforcement actions(CO, NOV, LOW, BY TYPE & DATE)

3 List unresolved enforcement actions/violations:
(If none, so state; Check past inspection sheets!!!!!!)

- 4 List any compliance schedules items not as yet completed:
(include due dates)

N/A

G. COMMENTS

annual report information 1983 (SQG)

Reclaimed Energy

Spent Toluene FOOS 9980 #

Environmental Processing Service (OH)

Spent Toluene FOOS 13425 #

Paint FOOS 13800 #

Chemical Solvents (OH)

Spent Methylene Chloride FOOS 41799 #

Contingency plan was submitted for comment March 29, 1985. Response was sent April 29, 1985 listing deficiencies of 1. address of emergency coord.
2. incomplete list of spill control equip. 3. outline of equip capabilities
4. alternate evacuation routes.

NOTE: IDENTIFY COMMENTS BY SPECIFIC AREA (i.e. closure, compliance). These will be the things to look for during the inspection visit.

Generator RCRA Inspection Report

EPA Identification Number: I N D 0 8 7 0 3 2 2 0 7

Installation Name: Design & Mfg. Corp. - Absocold Corp.

Location Address: 1767 Sheridan St.

City: Richmond, IN ZIP _____

Date of Inspection: 1/23/86 Time of Inspection 9:00 A.M.

Person(s) interviewed *

Title

Telephone

Paul Fuller Lab Supervisor 317/962-4511

Inspector(s)

Agency

Telephone

Bruce Kizer ISBH/DLAC 317/243-5082

Does this facility have any processes or activities which require a permit or a Part A permit application? If so, please list those activities by code or description below!!!

* Please identify correspondence contact

1. Verify EPA I.D. No. ✓

2. Type of Facility (G, T, TSD) based on inspection G

3. Type of Operation, Products Manufactured, Processes Utilized,
Size of Operation. Concentrate on processes that produce waste
(hazardous or non-hazardous)!

Manufacture refrigerators and dishwashers. Processes utilized
are metal washing and coating with iron & zinc phosphate, painting,
etching, Ni plating, vinyl coating, foam insulation. Solvents
are used to clean painting equip and the equip. used in injecting
the foam insulation. A methylene chloride strip tank has been removed.
Also a spray applied porcelain operation has been discontinued. A Ni
plating solution is filtered generating an F006 sludge. WWT sludge is landfilled near

4. Hazardous Waste
Streams/EPA #

	Source	Rate	Disposition
spent Toluene/F005	parts washing	100 gal/yr	Reclaimed Energy
" " "	painting	11,250 p/yr	" "
spent Methylene Chloride/F002	Foam Insulation	50,600 p/yr	Chemical Solvents
Ni sludge X F006	Ni plating	2/3 drum/month	Richmond Landfill
Alkaline cleaning solution/F002 & Rinse water	metal washers	?	city sewer

5. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption

6. Hazardous Waste
On-Site

	Amount	How Stored	Comments
<u>Spent Methylene Chloride</u>	<u>15 drums</u>	<u>55 gal drums</u>	
<u>Spent Toluene</u>	<u>2 "</u>	<u>" " "</u>	
<u>? Ali Sitter Sludge</u>	<u>?</u>	<u>pile under Sitter press - see photo</u>	

7. Is the Annual Report Accurate? ✓

8. List Transporters Used by the Company

Superior Oil, Chemical Solvent

9. Non-Hazardous
Waste Streams

	Source	Rate	Disposition
<u>Zinc & Fe sludge</u>	<u>phosphating</u>	<u>irregular</u>	<u>Richmond landfill</u>
<u>Coal Ash</u>	<u>boilers</u>	<u>100,000 Ton/Yr</u>	<u>on-site landfill</u>
<u>Al polishing Dust</u>	<u>polishing</u>	<u>?</u>	<u>Richmond landfill</u>
<u>vinyl primer sludge</u>	<u>vinyl coating</u>	<u>?</u>	<u>" "</u>
<u>Hydraulic oil</u>	<u>injection molding</u>		

Can the Company Document Questionable Waste Streams are
Non-Hazardous as Claimed? ✓

10. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer
Without Pretreatment Program, OSHA, etc.) _____

11. Additional Comments

D & M corp and Absocold Corp. are two separate corp. in two separate buildings located on the same property and owned by the same parent company. D & M Corp is closing operations in Richmond and moving to Connersville. Absocold will remain at Richmond unless the entire plant is sold.

Manifest Requirements:

YES NO NI

- 1) Does the operator have copies of the manifest available for review?

✓ — —

40 CFR 262.40 (320 IAC 4.1-10-1)

- 2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period

9
3/8/85 - 1/9/86

- 3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).

40 CFR 262.21 (320 IAC 4.1-8-1)

- a. Manifest document number?

(A sequential number for all manifests before September 20, 1984 and a five digit unique number after September 20, 1984.)

— ✓ —

- b. Name, mailing address, telephone number, and EPA ID number of generator?

✓ — —

- c. Name, telephone number (4.1-14-3) and EPA ID Number of Transporter(s)?

✓ — —

- d. Name, Address, telephone number (4.1-14-3) and EPA ID Number of designated permitted facility?

✓ — —

- e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?

— ✓ —

- f. The total quantity of waste(s) and the type and number of containers loaded?

✓ — —

- g. Required certification?

✓ — —

- h. Required signatures?

✓ — —

- i. EPA hazardous waste number (4.1-14-3)?

✓ — —

3a) Lacked a 5 digit unique number using ASBOI and DMO's type numbers.

3c) Improper DOT description should be Methylene Chloride, ORM-A,
UN1593 (see copy of manifests)

YES NO NI

4) Reportable exceptions:

40 CFR 262.42 (320 IAC 4.1-10-3)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.

0

5) If required, are placards available to transporters of hazardous waste?

40 CFR 262.33 (320 IAC 4.1-9-4)

— ✓ —

Transporter supplied

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste?

40 CFR 262.50 (320 IAC 4.1-11-1)

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing hazardous waste; has the generator met the manifest requirements?

	<u>✓</u>	

RECORDKEEPING AND REPORTING:

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
40 CFR 262.11 (320 IAC 4.1-7-2) ✓
- 2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40 (320 IAC 4.1-10-1) ✓
- 3) Has the generator submitted biennial reports and exception reports as required?
320 IAC 4.1-10-2 and 320 IAC 4.1-10-3 ✓
- 4) Are weekly inspections of container accumulation areas and daily and weekly inspections of tank storage areas done at the facility?
40 CFR 262.34(a)(1) (320 IAC 4.1-9-5) referencing 265.174
(320 IAC 4.1-23-5) for containers and 265.194
(320 IAC 4.1-24-4) for tanks ✓
- 6) Are these inspections documented? ✓

1. Failed to determine H₂O filter sludge

7) Do personnel training records required by reference in 40 CFR 262.34 (320 IAC 4.1-9-5) include:

- a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (320 IAC 4.1-16-7) ✓
- b. The name of the employees filling each job title?
40 CFR 265.16(d)(1) (320 IAC 4.1-16-7) ✓
- c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (320 IAC 4.1-16-7) ✓
- d. Description of both introductory and continuing training required for each job?
40CFR 265.16(d)(3) (320 IAC 4.1-16-7) ✓
- e. Records of training required in (d)?
40 CFR 265.16(d)4 (320 IAC 4.1-16-7) ✓
- f. Did facility personnel receive the required training including:
 - i) classroom or on the job ✓
 - ii) within 6 months of hire ✓
 - iii) annual review of training? ✓
- g. Are all training records maintained for current personnel and for at least three years for former employees?
40 CFR 265.16(e) [320 IAC 4.1-16-7(e)] ✓

Personnel training records for three supervisor positions are maintained by the facility. Instructions for handling hazardous waste was reviewed by plant personnel but does not meet the Training requirements and is not documented. (copy attached)

CONTINGENCY PLAN AND EMERGENCY PROCEDURE
[as required by reference in 40 CFR 262.34 (320 IAC 4.1-9-5)]

YES NO NI

1) Does the Contingency Plan contain the following information:

- | | | | |
|---|--------|--------|---|
| a. The actions facility personnel must take to comply with <u>265.51 (4.1-18-2)</u> and <u>265.56 (4.1-18-7)</u> in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). | ✓
— | — | — |
| b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to <u>265.37 (4.1-17-7)</u> ? | ✓
— | — | — |
| c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?
<u>40 CFR 265.52(d) (320 IAC 4.1-18-3)</u> | ✓
— | — | — |
| d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
<u>40 CFR 265.52(e) (320 IAC 4.1-18-3)</u> | — | ✓
— | — |
| e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
<u>40 CFR 265.52(f) (320 IAC 4.1-18-3)</u> | ✓
— | — | — |

2) Emergency Coordinator:

- | | | | |
|--|--------|---|---|
| a. Is the facility Emergency Coordinator identified?
<u>40 CFR 265.52(d) (320 IAC 4.1-18-3)</u> | ✓
— | — | — |
| b. Is coordinator familiar with all aspects of site operation and emergency procedures?
<u>40 CFR 265.55 (320 IAC 4.1-18-6)</u> | ✓
— | — | — |
| c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
<u>40 CFR 265.55 (320 IAC 4.1-18-6)</u> | ✓
— | — | — |

List only has fire extinguishers needs to add sprinklers, P.A., scott air pack, eye wash, absorbent, etc.

Preparedness and Prevention

[as required by reference in 40 CFR 262.34 (320 IAC 4.1-9-5)]

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37 (320 IAC 4.1-17-7)

✓

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?

40 CFR 265.53 (320 IAC 4.1-18-4)

✓

- 3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 40 CFR 265.56 (320 IAC 4.1-18-7)?

NA

PHYSICAL FACILITY INSPECTION

Preparedness and Prevention:

Part 265 Subpart C as required by 262.34 (320 IAC 4.1-9-5)

1) Maintenance and Operation of Facility

- a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? ✓
40 CFR 265.31 (320 IAC 4.1-17-2)

2) If required, does the facility have the following equipment:

- a. Internal communications or alarm systems? ✓
40 CFR 265.32(a) & 40 CFR 265.34(a) (320 IAC 4.1-17-3 & 5)
- b. Telephone or 2-way radios at the scene of operations? ✓
40 CFR 265.32(b) & 40 CFR 265.34(b) (320 IAC 4.1-17-3 & 5)
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? ✓
40 CFR 265.32(c) [320 IAC 4.1-17-3(c)]
- d. Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? ✓
40 CFR 265.32(d) [320 IAC 4.1-17-3(d)]
- _____
- _____
- _____
- _____
- _____
- _____

YES NO NI

3) Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (320 IAC 4.1-17-4)

— ✓ —

b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (320 IAC 4.1-17-4)

✓ — —

4) Has owner or operator provided immediate access to internal alarms? (If needed)
40 CFR 265.34(a) (320 IAC 4.1-17-5)

✓ — —

5) Does the owner or operator maintain adequate aisle space for inspections, movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
40 CFR 265.35 (320 IAC 4.1-17-6)

✓ — —

3a) Testing procedures for fire extinguishers only

PRE-TRANSPORT REQUIREMENTS:

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Is waste packaged in accordance with DOT regulations? (required prior to movement of hazardous waste off-site) <u>40 CFR 262.30 (320 IAC 4.1-9-1)</u>	<u> </u>	<u> </u>	<u> ✓ </u>
2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) <u>40 CFR 262.31-261.32 (320 IAC 4.1-9-2 & 3)</u>	<u> </u>	<u> </u>	<u> ✓ </u>
<hr/>			
<hr/>			
<hr/>			
3) On-site accumulation of generated hazardous wastes.			
a. Is the container clearly marked with the start of accumulation date? <u>40 CFR 262.34 (320 IAC 4.1-9-5)</u>	<u> ✓ </u>	<u> </u>	<u> </u>
b. Are <u>all</u> containers visible for inspection? <u>40 CFR 262.34(a)(2) (320 IAC 4.1-9-5)</u>	<u> ✓ </u>	<u> </u>	<u> </u>
c. Have more than 90 days elapsed since the date inspected in (a)? <u>40 CFR 262.34 (320 IAC 4.1-9-5)</u>	<u> </u>	<u> ✓ </u>	<u> </u>
d. Do wastes remain in accumulation tanks for more than 90 days? <u>40 CFR 262.34 (320 IAC 4.1-9-5)</u>	<u> NA </u>	<u> </u>	<u> </u>
e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? <u>40 CFR 262.34 (320 IAC 4.1-9-5)</u>	<u> NA </u>	<u> </u>	<u> </u>
<hr/>			
<hr/>			
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Use and Management of Containers

40 CFR 265 Subpart I
as required by 262.34 (320 IAC 4.1-9-5)

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are containers in good condition? <u>40 CFR 265.170 (320 IAC 4.1-23-1)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
2) Are containers compatible with waste in them? <u>40 CFR 265.172 (320 IAC 4.1-23-3)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
3) Are containers managed to prevent leaks? <u>40 CFR 265.173(b) (320 IAC 4.1-23-4)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
4) Are containers stored closed? <u>40 CFR 265.173(d) (320 IAC 4.1-23-4)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>40 CFR 265.176 (320 IAC 4.1-23-6)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) <u>40 CFR 265.177(a) (320 IAC 4.1-23-7)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>40 CFR 265.177(c) (320 IAC 4.1-23-7)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	<u>✓</u>	<u>—</u>	<u>—</u>
b. No Smoking signs?	<u>✓</u>	<u>—</u>	<u>—</u>
c. Separation and protection from ignition sources?	<u>✓</u>	<u>—</u>	<u>—</u>
9) Does the container storage area have adequate aisle space so that containers can be inspected for leaks or deterioration without moving the containers during the inspection (about 2.5 feet)? <u>320 IAC 4.1-23-4(c)</u>	<u>✓</u>	<u>—</u>	<u>—</u>

Tanks

40 CFR 265 Subpart J
as required by 262.34 (320 IAC 4.1-9-5)

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? <u>40 CFR 265.192(b) (320 IAC 4.1-24-2)</u>	_____	_____	_____
2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? <u>40 CFR 265.192(c) (320 IAC 4.1-24-2)</u>	_____	_____	_____
3) Do continuous feed systems have a waste-feed cut-off? <u>40 CFR 265.192(d) (320 IAC 4.1-24-2)</u>	_____	_____	_____
4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) <u>40 CFR 265.198 (320 IAC 4.1-24-6)</u>	_____	_____	_____
5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? <u>40 CFR 265.198(b) (320 IAC 4.1-24-6)</u>			
Tank capacity: _____ gallons			
Tank diameter: _____ feet			
Distance of tank from property line _____ feet			
(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.)			
6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	_____	_____	_____
b. No Smoking signs?	_____	_____	_____
c. Separation and protection from ignition sources?	_____	_____	_____

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

Remember to take photos and document as well as possible all violations!!!

